



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

EPA Region 5 Records Ctr.



385776

December 7, 2009

REPLY TO THE ATTENTION OF

SR-6J

Via Fax and Certified Mail
Return Receipt Requested

David L. Click, CPG
Civil & Environmental Consultants, Inc.
4274 Glendale Milford Road
Cincinnati, Ohio 45242
Fax: (513-985-0228)

RE: Former Eagle-Picher Site, Delta, Ohio
Administrative Order by Consent (AOC: V-W-98-C-458)
Revised Removal Action Report

Dear Mr. Click:

The U.S. Environmental Protection Agency (EPA) and its contractor Weston Solutions, Inc., have reviewed the Revised Removal Action Report and response to comments submitted by Civil & Environmental Consultants, Inc., on behalf of the current site owner, Bunting Bearings, LLC. The Revised Removal Action Report adequately addresses many of our previous comments with the exception of the following comments. Please incorporate these comments into a Final Removal Action Report and submit it to EPA no later than January 12, 2010.

General Comment: No photographs are provided that cover the timeframe of project activities that took place from June 2002 to October 2004. The photographs that provide an overview of the project activities during this period should also be included in this report.

Section 4.1.3, Page 16: For this section, CEC states that "[d]ocumentation regarding the specific correlation developed between the TSP airborne lead concentrations is not available." In such a situation, CEC needs to amend this section to provide information concerning what action level(s) were used to determine when dust suppression and engineering controls were deemed necessary, the monitoring equipment used for determining the dust levels, and what specific dust and engineering controls were used once dust suppression was deemed necessary.

Section 4.7.1, Page 49: For this section, CEC provides a reasonable explanation, in the response to comments letter, as to why Sample VNP3-05-6.0 was not analyzed for lead. However, this explanation is not provided in the body of the revised report. CEC should provide this explanation in Section 4.7.1, so that a reader can fully understand why this sample was not analyzed for lead.

Section 4.7.7.3, Page 68: It is stated that CEC collected VNSY-01-50" between March 10, and April 12, 2004. However, based on the information provided in Table 20, this sample was actually collected on February 28, 2004. Also, no information is provided in this section on Samples VNSY-01-27" and VNSY-02-40". CEC should revise this paragraph to correct the information for Sample VNSY-01-50" and to include the information for Samples VNSY-01-27" and VNSY-02-40".

Section 4.7.7.4, Page 69: Since the analytical results for samples collected from Building B25 for PCB and asbestos analysis cannot be located, CEC should state in this section that the monthly progress report from April 2004 indicates that PCBs were detected at concentrations less than 1 mg/kg, and that asbestos was not detected above the laboratory quantitation limit.

Section 4.12, Page 85: The revised figure showing the deed-restricted areas of the site (which is located in Appendix III of the revised report) has not been included in the report.

Figure 2: This figure is not included in the revised report. Therefore, the revisions that CEC made to this figure (i.e., inclusion of Building B17 and Building B23) cannot be confirmed.

Figure 3: This figure still does not show the entire area that was remediated from June 2002 to October 2004. This figure should be revised to include all of the areas that CEC remediated from June 2002 to October 2004, or CEC should state that Figure 4 shows the entire onsite and offsite excavation areas, not Figure 3.

Figure 4:

(a) This figure does not provide the entire name of each sampling location. As such, the sample depth and, when applicable, the "R" or "b" designations (which denote resample points) should be included in the sampling location names.

(b) Two locations are shown for Sample VNA5-01, while no location is shown for VNA5-06. This figure needs to be corrected to include the correct locations for both VNA5-01 and VNA5-06.

(c) While this figure provides a location for Sample VNB8-06, no analytical result for this sample is provided in Table 10 of this report. Table 10 should be revised to include the analytical result for this sample, or CEC should provide an explanation in the report that explains why it is not necessary to list this analytical result in Table 10.

(d) No sampling locations are provided for the following samples: VNB9-06-4.0', VNB12-02-3.0', VNB12-03-2.5', VNB13-06-2.5', VNSY-09B-36", VNWS-06B-10", VNSY-19B-22", VNWS-28-20", VNSY-26B-44", and VNVCD-12-56". CEC should include these samples in Figure 4, or should provide an explanation in the report of why it is not necessary to have these points on the figure.

(e) Only two sampling locations are shown in Building B11, but three sample names (two of which are the same: VNB11-02) are shown in this building. This section of the figure should be revised to remove the duplicate VNB11-02 sample name.

If you have any questions regarding this matter, please contact me at (312) 886-4442.

Sincerely,

A handwritten signature in black ink, appearing to read "Matthew J. Ohl". The signature is fluid and cursive, with the first name "Matthew" and last name "Ohl" clearly distinguishable.

Matthew J. Ohl
Remedial Project Manager

enclosure

Cc via e-mail: John W. Hilbert, Shumaker, Loop & Kendrick
Omprakash Patel, Weston Solutions Inc.
Craig Melodia, U.S. EPA
Ghassan Tafla, Ohio EPA